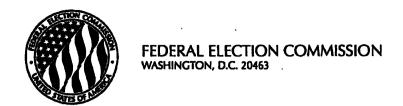


THIS IS THE <u>BEGINNING</u> OF ADMINISTRATIVE FINE CASE #2
---

DATE SCANNED 7-5-13

SCANNER NO. 2

SCAN OPERATOR <u>Jaw</u>



January 31, 2011

#### **MEMORANDUM**

TO:

THE COMMISSION

THROUGH:

ALEC PALMER

ACTING STAFF DIRECTOR

FROM:

PATRICIA CARMONA YCCHIEF COMPLIANCE OFFICER

DEBBIE CHACONA

ASSISTANT STAFF DIRECTOR REPORTS ANALYSIS DIVISION

BY:

MODI WINSHIP/SARI PICKERALIC

**COMPLIANCE BRANCH** 

SUBJECT:

REASON TO BELIEVE RECOMMENDATION – 2010 30 DAY POST-GENERAL REPORT (AUTHORIZED COMMITTEES) FOR

THE ADMINISTRATIVE FINE PROGRAM

Attached is a list of political committees and their treasurers who failed to file or timely file the 2010 30 Day Post-General Report in accordance with 2 U.S.C. 434(a). The list is comprised of authorized committees whose candidates sought election in the November 2nd General Election.

The committees listed in the attached RTB Circulation Report either failed to file the report, filed the report more than five (5) days after the due date, or filed the report more than thirty (30) days after the due date (considered a non-filed report). In accordance with the schedule of civil money penalties for reports at 11 CFR 111.43, these committees should be assessed the civil money penalties highlighted on the attached circulation report.

## Recommendation

- 1. Find reason to believe that the political committees and their treasurers listed on the RTB Circulation Report violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalties would be the amounts indicated on the RTB Circulation Report.
- 2. Send the appropriate letters.

Federal Election Commission
Reason to Believe Circulation Report
2010 POST-GENERAL Not Election Sensitive 12/02/2010 AUTH (CA, FL, GA, KY, MA, NC, NY, OH, PA, TX, VT)

BOB 7	CONGRESS	Candidate Name TURNER, ROBERT L.	Treasurer Threshold PV Receipt Days Late Date  KEVIN P. \$753,762 0 1/13/2011 Not Filed	Threshold \$753,762	<b>à</b> 0	Receipt Date 1/13/2011	Threshold PV Receipt Days Late Date  \$753,762 0 1/13/2011 Not Filed	LOA \$86,572	RTB Penalty \$3,850
CIRO RODRIGUEZ FOR	RO.	RODRIGUEZ, CIRO D.	LUIS R. VERA   \$2,959,474   0	\$2,959,474	•		Not Filed	Not Filed \$328,830 (est) \$8,800	88

\$1,535
\$119,477
7
12/9/2010 .
0
\$463,831
CHARLES
BRITTON, LEONARD WHEELER
LEN BRITTON FOR VERMONT
2294   C00472597

2297	2297 C00411991	PATRICK MURPHY FOR CONGRESS	MURPHY, PATRICK J.	LINDSAY F. ANGERHOLZER	\$8,537,802	0	1/25/2011	Not Filed	Not Filed \$1,553,296	\$12,000
2298	2298 C00464347	TIM ALLISON FOR CONGRESS	ALLISON, TIMOTHY JAMES	SUSAN	\$341,248	0	12/8/2010	9	\$56,781	\$825
2299	2299 C00465336	TOM WESLEY FOR US CONGRESS	WESLEY, TOM	PAUL M. YANOVITCH	\$209,658	0		Not Filed	Not Filed \$29,951 (est)	\$990

# BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
Reason To Believe Recommendation - 2010	)	
30 Day Post-General Report (Authorized	)	
Committees) for the Administrative Fine	)	
Program:	)	
LEN BRITTON FOR VERMONT, and	)	AF# 2294
CHARLES TAYLOR as treasurer;	)	
TIM ALLISON FOR CONGRESS, and	)	AF# 2298
SUSAN HERRERA as treasurer;	)	
BOB TURNER FOR CONGRESS, and	)	AF# 2284
KEVIN P TURNER as treasurer;	)	
CIRO RODRIGUEZ FOR CONGRESS,	)	AF# 2286
and VERA IIIIS R MR as treasurer	1	

PATRICK MURPHY FOR CONGRESS, ) AF# 2297 and ANGERHOLZER, LINDSAY F. as ) treasurer; )

TOM WESLEY FOR US CONGRESS, and ) AF# 2299 PAUL M YANOVITCH as treasurer; )

### **CERTIFICATION**

I, Shawn Woodhead Werth, Secretary and Clerk of the Federal Election

Commission, do hereby certify that on February 02, 2011 the Commission took the
following actions on the Reason To Believe Recommendation - 2010 30 Day PostGeneral Report (Authorized Committees) for the Administrative Fine Program as
recommended in the Reports Analysis Division's Memorandum dated January 31,
2011, on the following committees:

Federal Election Commission Certification for Administrative Fines February 02, 2011

Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2298 Decided by a vote of 6-0 to: (1) find reason to believe that TIM ALLISON FOR CONGRESS, and SUSAN HERRERA as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2284 Decided by a vote of 6-0 to: (1) find reason to believe that BOB TURNER FOR CONGRESS, and KEVIN P TURNER as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Peterson, Walther, and Weintraub voted affirmatively for the decision.

AF#2286 Decided by a vote of 6-0 to: (1) find reason to believe that CIRO RODRIGUEZ FOR CONGRESS, and VERA, LUIS R. MR. as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2297 Decided by a vote of 6-0 to: (1) find reason to believe that PATRICK MURPHY FOR CONGRESS, and ANGERHOLZER, LINDSAY F. as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

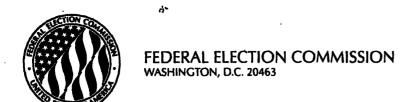
AF#2299 Decided by a vote of 6-0 to: (1) find reason to believe that TOM WESLEY FOR US CONGRESS, and PAUL M YANOVITCH as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

Attest:

Femuny 4,3011

Shawn Woodhead Werth

Secretary and Clerk of the Commission



February 7, 2011

Paul M. Yanovitch, in official capacity as Treasurer Tom Wesley for US Congress 190 Dutcher Street Hopedale, MA 01747

C00465336 AF#: 2299

Dear Mr. Yanovitch:

The Federal Election Campaign Act of 1971, as amended ("the Act"), requires that your committee file a 30 Day Post-General Report of Receipts and Disbursements in a calendar year during which there is a regularly scheduled general election for which the candidate sought election. This report, covering the period through November 22, 2010, shall be filed no later than December 2, 2010. 2 U.S.C. § 434(a). Records at the Federal Election Commission ("FEC") indicate that this report was not filed within thirty (30) days of the due date. You should file the report if you have not already done so.

The Act was further amended in 1999 to permit the FEC to impose civil money penalties for violations of the reporting requirements of 2 U.S.C. § 434(a). 2 U.S.C. § 437g(a)(4). On February 2, 2011, the FEC found that there is reason to believe ("RTB") that Tom Wesley for US Congress and you, in your official capacity as treasurer, violated 2 U.S.C. § 434(a) by failing to file timely this report on or before December 2, 2010. Based on the FEC's schedules of civil money penalties at 11 C.F.R. § 111.43, the amount of your civil money penalty calculated at the RTB stage is \$990. Please see the attached copy of the Commission's administrative fine regulations at 11 C.F.R. §§ 111.30-111.46. Attachment 1. The Commission's website contains further information about how the administrative fine program works and how the fines are calculated. See <a href="http://www.fec.gov/af/af.shtml">http://www.fec.gov/af/af.shtml</a>. 11 C.F.R. § 111.34. Your payment of \$990 is due within forty (40) days of the finding, or by Murch 14, 2011, and is based on these factors:

Sensitivity of Report: Not Election Sensitive

Level of Activity: \$29,951 Number of Days Late: Not Filed

Number of Previous Civil Money Penalties Assessed: 0

At this juncture, the following courses of action are available to you:

1. If You Choose to Challenge the RTB Finding and/or Civil Money Penalty

If you should decide to challenge the RTB finding and/or calculated civil money penalty, you must submit a written response, including the AF# found at the top of page 1 under your committee's identification number, to the FEC's Office of Administrative Review, 999 E Street, NW, Washington, DC 20463. Your response must be received within forty (40) days of the Commission's RTB finding, or March 14, 2011. 11 C.F.R. § 111.35(a). Your written response must include the reason(s) why you are challenging the RTB finding and/or calculated civil money penalty, and must include the factual basis supporting the reason(s) and supporting documentation. The FEC strongly encourages that documents be submitted in the form of affidavits or declarations. 11 C.F.R. § 111.36(c).

The FEC will only consider challenges that are based on at least one of three grounds: (1) a factual error in the RTB finding; (2) miscalculation of the calculated civil money penalty by the FEC; or (3) your demonstrated use of best efforts to file in a timely manner when prevented from doing so by reasonably unforeseen circurostances that were beyond your control. 11 C.F.R. § 111.35(b). In order for a challenge to be considered on the basis of best efforts, you must have filed the required report no lnter than 24 hours after the end of these reasonably unforespon circumstances. Id. Examples of oircumstances that will be considered reasonably unforeseen and beyond your control include, but are not limited to, (1) a failure of Commission computers or Commission-provided software despite your seeking technical assistance from Commission personnel and resources; (2) a widespread disruption of information transmissions over the Internet that is not caused by a failure of the Commission's or your computer systems or Internet service provider; and (3) severe weather or other disaster-related incident. 111.35(c). Examples of circumstances that will not be considered reasonably unforeseen and beyond your control include, but are not limited to, (1) negligence; (2) delays eaused by vendors or contractors; (3) treasurer and staff illness, inexperience or unuveilability; (4) committee computer, software, or Internet service provider failures; (5) failure to know filing dates; and (6) fariure to use filing software properly. 11 C.F.R. § 111.35(d).

The "failure to raise an argument in a timely fashion during the administrative process shall be deemed a waiver" of your right to present such argument in a petition to the U.S. district court under 2 U.S.C. § 437g. 11 C.F.R. § 111.38.

If you intend to be represented by counsel, please advise the Office of Administrative Review. You should provide, in writing, the name, address and telephone number of your counsel and authorize counsel to receive notifications and communications relating to this challenge and imposition of the calculated civil money penalty.

## 2. If You Choose Not to Pay the Civil Money Penalty and Not to Submit a Challenge

If you do not pay the calculated civil money penalty and do not submit a written response, the FEC will assume that the preceding factual allegations are true and make a final determination that Tom Wesley for US Congress and you, in your official capacity as treasurer, violated 2 U.S.C. § 434(a) and assess a civil money penalty.

Unpaid civil money penalties assessed through the Administrative Fine regulations will be subject to the Debt Collection Act uf 1982 ("DCA"), as amended by the Dubt Collection Improvement Act of 1996, 31 U.S.C. § 3701 et seq. The FEC may take any and all appropriate

action authorized and required by the DCA, as amended, including transfer to the U.S. Department of the Treasury for collection. 11 C.F.R. § 111.51(a)(2).

### 3. If You Choose to Pay the Civil Money Penalty

If you should decide to pay the calculated civil money penalty, send the enclosed remittance form, along with your payment, to the FEC at the address on page 4. Upon receipt of your payment, the FEC will send you a final determination letter.

This matter was generated based on information ascertained by the FEC in the normal course of carrying out its supervisory responsibilities. 2 U.S.C. § 437g(a)(2). It will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and 437g(a)(12)(A) until it is placed on the public record in accordance with 11 C.F.R. § 111.42, unless you notify the FEC in writing that you wish the matter to be made public.

As noteth carlier, you may obtain additional information on the FEC's administrative fine program, including the final regulations, on the FEC's website at <a href="http://www.fec.gov/af/af.shtml">http://www.fec.gov/af/af.shtml</a>. If you have questions regarding the payment of the calculated civil money penalty, please contact Sari Pickerall in the Reports Analysis Division at our toll free number (800) 424-9530 (at the prompt press 5) or (202) 694-1130. If you have questions regarding the submission of a challenge, please contact the Office of Administrative Review at our toll free number (800) 424-9530 (press 0, then ext. 1660) or (202) 694-1660.

On behalf of the Commission,

Cynthia L. Bauerly

Chair

## ADMINISTRATIVE FINE REMITTANCE & PAYMENT INSTRUCTIONS

In accordance with the schedule of penalties at 11 C.F.R. § 111.43, the amount of your civil money peaalty calculated at RTB is \$990 for the 2010 Post-General Report.

Please mail this remittance with a check or money order made payable to the Federal Election Commission to the following address:

**Federal Election Commission** P.O. Box 979058 St. Louis, MO 63197-9000

If you choose to send your remittance and payment by courier or overnight delivery, please use this address:

U.S. Bank - Government Lockbox FEC #979058 1005 Convention Plaza Attn: Government Lockbox, SL-MO-C2GL St. Louis, MO 63101

The remittance and your payment are due by March 14, 2011. Upon receipt of your remittance and payment, the FEC will send you a final determination letter.

#### PAYMENTS BY PERSONAL CHECK

Personal checks will be converted into electronic funds transfers (EFTS). Your account will be electronically debited for the amount on your check, usually within 24 hours, and the debit will appear on your regular statement. We will destroy your original check and keep a copy of it. In case the EFT cannot be processed for technical reasons, you authorize us to process the copy in lieu of the original check. Should the EFT not be completed because of insufficient funds, we may try to make the transfer twice.

#### PLEASE DETACH AND RETURN THE PORTION BELOW WITH YOUR PAYMENT

FOR: Tom Wesley for US Congress

FEC ID#: C00465336

AF#: 2299

PAYMENT DUE DATE: March 14, 2011

**PAYMENT AMOUNT DUE: \$990** 



May 18, 2011

#### **MEMORANDUM**

TO:

The Commission

THROUGH:

Alec Palmer

**Acting Staff Director** 

FROM:

Patricia Carmona M for PC

Chief Compliance Officer

Debbie Chacona Assistant Staff Director
Reports Analysis Division

BY:

Vodi Wittship/Sari Pickerall

Compliance Branch

SUBJECT:

Administrative Fine Program - Final Determination Recommendation for the

2010 30 Day Post-General Report (Authorized Committees).

Attached are two lists of political committees and their treasurers against which the Commission has found reason to believe (RTB) and assessed proposed civil money penalties calculated at RTB for failure to file or failure to timely file the 2010 30 Day Post-General Report. The first list represents the committees that have paid the civil money penalty and the second list represents the committees that have not paid the civil money penalty. The committees that have not paid have been given at least forty (40) days from the date of the Commission's RTB finding to remit payment.

In accordance with 11 CFR § 111.34 and 11 CFR § 111.40, the Commission shall send a final determination notice to those respondents that have either paid or not paid the civil money penalty.

Also, two (2) committees detailed below designated a new Treasurer after the RTB finding:

- Patrick Murphy for Congress (AF 2297) filed an Amended Statement of Organization after the RTB finding designating Timothy R. Persico as Treasurer (see first list).
- Tom Wesley for US Congress (AF 2299) filed an Amended Statement of Organization after the RTB finding designating Catherine Mitchell as Treasurer (see first list).

### **RAD Recommendation**

- (1) Make final determination that the political committees and their treasurers listed on the attached reports violated 2 U.S.C. § 434(a) and assess the final civil money penalties so indicated.
- (2) Send the appropriate letters.

Federal Election Commission
FD Circulation Report Fine Paid
2010 POST-GENERAL Not Election Sensitive 12/02/2010 AUTH (CA, FL, GA, KY, MA, NC, NY, OH, PA, TX, VT)

Amount Paid	\$3,850	\$8,800
Date Paid	\$3,850 02/15/2011	\$8,800 04/21/2011 \$8,800
Final Money Penalty	\$3,850	
RTB Penalty	1 \$3,850	\$8,800
RTB Date	02/02/2011	02/02/2011
₹	0	ο.
Receipt Date Days Late LOA PV RTB Date RTB Penalty Finel Money Date Paid Amount Penalty Penalty Paid	01/13/2011 Not Filed \$88,572 0 02/02/2011	02/13/2011 Not Filed \$319,130 0 02/202011 \$8,900
Days Late	Not Filed	Not Filed
Receipt Date	01/13/2011	02/13/2011
Treasurer	KEVIN P. TURNER	LUIS R. VERA
Committee ID	C00483495	C00328088
Candidate Name	TURNER, ROBERT L	RODRIGUEZ, CIRO D. C00328088
AF# Committee Name		CIRO RODRIGUEZ FOR
AF#	2284	2286

	•									-			
E	LEN BRITTON FOR VERMONT	BRITTON, LEONARD WHEELER	C00472597	CHARLES TAYLOR 12/09/2010	12/08/2010	7	\$119,477	0	02/02/2011	\$1,536	\$1,535	03/07/2011 \$1,635	\$1,635
PATR	PATRICK MURPHY FOR CONGRESS	MURPHY, PATRICK J.	C00411991	TIMOTHY R. PERSICO 01/25/2011 Not Filed \$1,654,039	01/25/2011	Not Filed	\$1,654,039	0	0 02/02/2011	\$12,000	\$12,000	\$12,000 02/28/2011	\$12,000
-	TIM ALLISON FOR CONGRESS	ALLISON, TIMOTHY JAMES 000464347	C00464347	SUSAN HERRERA	12/08/2010	8	\$58,781	0	02/02/2011	\$825	\$825	02/18/2011	\$825
<u>p</u>	OM WESLEY FOR US	WESLEY, TOM	C00465338	CATHERINE MITCHELL 03/28/2011 Not Filed \$72,092	03/28/2011	Not Filed	\$72,082	0	1102/20/20	088\$	\$990	03/18/2011	\$990

# BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
Administrative Fine Program - Final Determination Recommendation for the 2010 30 Day Post-General Report (Authorized Committees): BOB TURNER FOR CONGRESS, and	))))	AF# 2284
KEVIN P TURNER as treasurer;	Ś	
CIRO RODRIGUEZ FOR CONGRESS, and VERA, LUIS R. MR. as treasurer;	)	AF# 2286
11		
LEN BRITTON FOR VERMONT, and CHARLES TAYLOR as treasurer:	)	AF# 2294
-		
PATRICK MURPHY FOR CONGRESS, and PERSICO, TIMOTHY R as treasurer;	)	AF# 2297
TIM ALLISON FOR CONGRESS, and SUSAN HERRERA as treasurer;	)	AF# 2298
TOM WESLEY FOR US CONGRESS, and MITCHELL, CATHERINE as treasurer;	)	AF# 2299

#### **CERTIFICATION**

I, Shawn Woodhead Werth, Secretary and Clerk of the Federal Election

Commission, do hereby certify that on May 20, 2011 the Commission took the

following actions on the Administrative Fine Program - Final Determination

Recommendation for the 2010 30 Day Post-General Report (Authorized Committees)

as recommended in the Reports Analysis Division's Memorandum dated May 18,

2011, on the following committees:

AF#2284 Decided by a vote of 6-0 to: (1) make a final determination that BOB TURNER FOR CONGRESS, and KEVIN P TURNER as treasurer, violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2286 Decided by a vote of 6-0 to: (1) make a final determination that CIRO RODRIGUEZ FOR CONGRESS, and VERA, LUIS R. MR. as treasurer, violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

1092660784

AF#2294 Decided by a vote of 6-0 to: (1) make a final determination that LEN BRITTON FOR VERMONT, and CHARLES TAYLOR as treasurer, violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2297 Decided by a vote of 6-0 to: (1) make a final determination that PATRICK MURPHY FOR CONGRESS, and PERSICO, TIMOTHY R as treasurer, violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2298 Decided by a vote of 6-0 to: (1) make a final determination that TIM ALLISON FOR CONGRESS, and SUSAN HERRERA as treasurer, violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2299 Decided by a vote of 6-0 to: (1) make a final determination that TOM WESLEY FOR US CONGRESS, and MITCHELL, CATHERINE as treasurer, violated

1992660785

2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

Attest:

hawn Woodhead Werth

Secretary and Clerk of the Commission

May 23, 2011

Catherine Mitchell, in official capacity as Treasurer Tom Wesley for US Congress 190 Dutcher St Hopedale, MA 01747

C00465336 AF#: 2299

Dear Ms. Mitchell:

On February 2, 2011, the Federal Election Commission ("the Commission") found reason to believe ("RTB") that Tom Wesley for US Congress and its treasurer violated 2 U.S.C. § 434(a) for filing late or failing to file the 2010 Post-General Report. By letter dated February 7, 2011, the Commission sent notification of the RTB finding that included a civil money penalty calculated at the RTB stage of \$990 in accordance with the schedule of penalties at 11 C.F.R. § 111.43.

On March 18, 2011, the FEC received payment of the civil money penalty ealculated at the RTB stage. The FEC made a final determination on May 20, 2011 that you, in your official capacity as treasurer, and Tom Wesley for US Congress violated 2 U.S.C. § 434(a), assessed a civil money penalty in the amount of \$990 in accordance with 11 C.F.R. § 111.43, and voted to close the file.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. The file will be made a part of the public record pursuant to 11 C.F.R. § 111.42(b). Although the file must be placed on the public record within thirty (30) days from the date of the Commission's notification, this could occur at anytime following certification of the Commission's vote.

If you have any questions regarding this matter, please contact Sari Pickerall on our toll free number (800) 424-9530 (at the prompt press 5) or (202) 694-1130.

On behalf of the Commission,

potr barrely

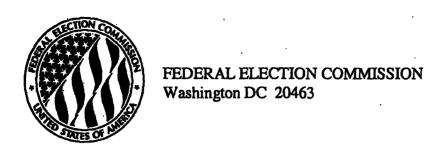
Cynthia L. Bauerly

Chair

QUALITY IS OUR PRIORITY FOR LOCKBOX 9058 SEQ# 001 \$ 0000099000 BA# 1 03-18-11 20 4



TOM WESLEY FOR US C	CONGRESS	2014
HOPEDALE, MA 01747	3/14/11	\$3-13/110 MA 82193
wast Federal Fletin	a Commission 1800	200
Nine Hundred Nineti	Dollar	
Bank of America		
ACU DE DISTRICTA	A On a	1
COO465336/16229	. Grona Think	1-1
Charles Charles		



THIS IS	THE END OF	ADMINISTRA	ATIVE FINE	CASE#	1255

 $.:_{\lambda_{1}^{\prime}}$ 

DATE SCANNED	7-5-11

SCAN OPERATOR Jan